

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KRISTINA FINK, on behalf of the Nation
Safe Drivers Employee Stock Ownership
Plan, and on behalf of a class of all other
persons similarly situated,

Plaintiff,

-vs.-

WILMINGTON TRUST, N.A., as successor
to Wilmington Trust Retirement and
Institutional Services Company, ANDREW
SMITH, MICHAEL SMITH, and FRANK
MENNELLA.

Defendants,

and

WILMINGTON TRUST, N.A., as successor
to Wilmington Trust Retirement and
Institutional Services Company.

Third-Party Plaintiff,

v.

STOUT RISIUS ROSS, INC. and
STOUT RISIUS ROSS, LLC,

Third-Party Defendants.

Case No. 19-1193-CFC

**PLAINTIFF'S UNOPPOSED MOTION FOR
ATTORNEYS' FEES, LITIGATION EXPENSES
AND CLASS REPRESENTATIVE SERVICE AWARD**

Plaintiff Kristina Fink, Individually and as Class Representative, move the Court for an order granting an award of attorneys' fees, litigation expenses and a class representative service award.

Good cause exists for granting this motion as set forth in the accompanying Opening Brief, Declaration of Gregory Porter, and Declaration of Daniel Feinberg, and the exhibits attached to those declarations.

Pursuant to D. Del. LR 7.1.1, the undersigned Delaware counsel states that he contacted opposing counsel and they do not oppose the relief requested herein.

Dated: August 2, 2021

/s/ David A. Felice
David A. Felice (#4090)
BAILEY & GLASSER LLP
Red Clay Center at Little Falls
2961 Centerville Road, Suite 302
Wilmington, Delaware 19808
Telephone: (302) 504-6333
dfelice@baileyglasser.com

Gregory Y. Porter (*pro hac vice*)
Ryan T. Jenny (*pro hac vice*)
Patrick O. Muench (*pro hac vice*)
BAILEY & GLASSER LLP
1055 Thomas Jefferson St., NW
Suite 540
Washington, DC 20007
Telephone: (202) 463-2101
gporter@baileyglasser.com
rjenny@baileyglasser.com
pmuench@baileyglasser.com

Daniel Feinberg (*pro hac vice*)
FEINBERG, JACKSON, WORTHMAN &
WASOW LLP
2030 Addison Street, Suite 500
Berkeley, CA 94704
Telephone: (510) 269-7998
dan@feinbergjackson.com

Attorneys for Plaintiff and the Class